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## Rapaport Law Firm

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IT IS HEREBY ORDERED that the parties shall provide the Court with three dates within a week of October 18, 2022 on which counsel can appear for a remote video Teams proceeding regarding the discovery dispute by **October 17, 2022**. The extension of discovery shall be addressed at that conference.

Dated: October 14, 2022  
New York, New York

SO ORDERED



JENNIFER L. ROCHON  
United States District Judge

October 13, 2022

### **BY ECF**

Hon. Jennifer L. Rochon  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: Gilberto Trinidad et al. v. 62 Realty, LLC, et al.**  
**Case No. 22-cv-00101 (JMF) (GWG)**

Dear Judge Rochon:

We are counsel for Plaintiffs in the above-referenced matter. We write jointly with counsel for Defendants to respectfully request an adjournment of the conference that is scheduled for October 18, 2022 at 12:00 p.m. ECF No. 54. We make this request because Plaintiff's undersigned counsel has a trial scheduled for October 17<sup>th</sup> and 18<sup>th</sup> in Nassau County Supreme Court.

Counsel for the parties have discussed, at length, proposed dates for the requested adjournment. These proposed dates take into consideration that Plaintiff's counsel will be overseas from the evening of October 18<sup>th</sup> through November 1, 2022. Accordingly, the parties respectfully request that the conference be adjourned to any time on the following dates: November 4, 7, 9, 10 or 14.

In addition, the current discovery cut-off is October 18, 2022. ECF No. 49. Because of their unresolved disputes regarding written discovery, the parties have not yet conducted depositions. Therefore, the parties respectfully request that the discovery deadline be extended to December 20, 2022. This is the second request for an extension of the discovery deadline. The first request, which was made jointly by all parties on August 9, 2022 [ECF No. 48], led to Judge Furman's Order of August 10, 2022, extending the discovery deadline from September 12, 2022 to October 18, 2022.

Honorable Jennifer L. Rochon  
United States District Judge  
October 13, 2022

We appreciate the Court's attention to this request.

Respectfully yours,

/s/

Marc A. Rapaport

cc: Alan Smikun, Esq. (*Via ECF only*)